

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

ANNA GONZALEZ and RONALD K.
PAGE, on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

STATE FARM LIFE INSURANCE
COMPANY,

Defendant.

Civil Action No. 5:20-cv-00617

PARTIES' JOINT ADR REPORT

The parties jointly submit this Alternative Dispute Resolution ("ADR") Report as ordered by the Court:

1. Status of Settlement Negotiations.

Pursuant to the Court's scheduling order (Doc. 67), Plaintiffs served a written offer of settlement on Defendant on February 1, 2021, and Defendant responded, in writing, on February 8, 2021.

2. Persons Responsible for Settlement Negotiations.

Plaintiffs and their counsel, John J. Schirger, Norman E. Siegel, and Ethan M. Lange are responsible for settlement negotiations on Plaintiffs' behalf. Defendant and its counsel, Wayne B. Mason and Susan E. Egeland, are responsible for settlement negotiations on Defendant's behalf.

3. Alternative Dispute Resolution in this Action.

The parties conferred about alternative dispute resolution (ADR) and whether it is appropriate for this case. The parties' positions are as follows:

Plaintiffs' statement: This lawsuit is one of several related cases pending against Defendant related to the same alleged conduct (*see, e.g.*, Arizona, California, Florida, Georgia, Minnesota, Missouri, Oregon, and Washington). To date, Defendant has not expressed interest in attempting to resolve any of these matters. Plaintiff is willing to discuss settlement in this case individually or in conjunction with other related lawsuits.

Defendant's statement: Defendant believes that any discussion of ADR is premature at this time because, among other reasons, there are threshold legal issues that may dispose of the case. As for the other cost of insurance cases, each is distinct because of the differences in underlying state law and the development of material facts that may affect the outcome.

If the parties later determine that ADR is appropriate, they prefer private mediation.

Respectfully submitted,

/s/ Ethan M. Lange

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CERTIFICATE OF SERVICE

I hereby certify that on February 22, 2021, I caused a true and correct copy of the foregoing to be filed on the Court's CM/ECF system, which served notice on all counsel of record.

/s/ Ethan M. Lange